

IN RE:)	
)	UNITED STATES' MOTION (1) FOR
CAMP LEJEUNE WATER LITIGATION)	SUMMARY JUDGMENT, AND IN THE
)	ALTERNATIVE, (2) PARTIAL
This Document Relates To:)	SUMMARY JUDGMENT ON THE
)	CAUSAL LINK BETWEEN
<i>McElhiney v. United States</i> , 7:23-cv-1368)	PERCHLOROETHYLENE (PCE) AND
<i>Peterson v. United States</i> , 7:23-cv-1576)	PARKINSON'S DISEASE
<i>Rothchild v. United States</i> , 7:23-cv-858)	
<i>Sparks v. United States</i> , 7:23-cv-682)	Fed. R. Civ. P. 56
<i>Welch v. United States</i> , 7:23-cv-1503)	

As explained in the accompanying Memorandum of Law, because all of Plaintiffs' PD experts' opinions and testimony on general and specific causation are unreliable, the five bellwether PD Plaintiffs are unable to satisfy the general and specific causation elements of the Camp Lejeune Justice Act of 2022. Accordingly, the Court should grant summary judgment in favor of the United States on the issue of general and specific causation as to PD in Track 1 and in the above-captioned cases and dismiss all related claims.

In the alternative, this Court should grant partial summary judgment in favor of the United States on the issue of causal link between PCE and PD and dismiss Plaintiffs' claims insofar as they assert a claim as to the causal link between PCE and PD.

Dated: September 10, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

JONATHAN GUYNN
Deputy Assistant Attorney General
Torts Branch

BRIDGET BAILEY LIPSCOMB
Chief, Camp Lejeune Justice Act Section

SARA J. MIRSKY
Acting Assistant Director

ADAM BAIN
Special Litigation Counsel

ANNA E. ELLISON
ELIZABETH K. PLATT
JESSICA L. ANS
HANLEY W. GIBBONS
CAMILLE D. JOHNSON
JOSEPH B. TURNER
Trial Attorneys

/s/ Cindy M. Hurt
CINDY M. HURT
Virginia Bar No.: 86826
Trial Attorney
United States Department of Justice
Civil Division, Torts Branch
Camp Lejeune Justice Act Section
1100 L Street NW
Washington, DC 20005
202-718-8160
Cindy.M.Hurt@usdoj.gov

Attorney inquiries to DOJ regarding the
Camp Lejeune Justice Act:
(202) 353-4426

*Attorneys for Defendant,
United States of America*

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2025, I electronically filed the foregoing using the Court's Case Management/Electronic Case Files system, which will send notice to all counsel of record.

/s/ Cindy M. Hurt
CINDY M. HURT